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REMARKS

This paper is responsive to the Non-Final Office Action dated June 1, 2004. Claims 1 – 41 were examined. None of the claims have been amended. Applicants respectfully traverse all of the rejections.

Preliminary Matters

The same problems that have plagued past Office Actions reappear in the current Office Action. The Office Action

- 1) improperly relies solely on disclosure of the hypertext transfer protocol (HTTP), which is insufficient to anticipate Applicants' claims, and
- 2) rejects claims with an incomplete basis (and sometimes no basis) for the rejection.

The Office Action supports the rejections in the current Office Action with a different reference than the one relied upon in the previous Office Action, but the Office's mistaken reasoning remains the same. The Office simply relies on disclosure of HTTP requests. Applicants respectfully submits that HTTP does not teach or suggest Applicants' claims, and that rejections that rely on HTTP as anticipating Applicants' claims lack sufficient support. Applicants also respectfully submit that the rejections are not clearly articulated and do not allow Applicants to reply completely. Rejections of numerous claims rely on the Office indicating some of the limitations of Applicants' claims as being disclosed by a reference, but failing to indicate or argue that all of the limitations are disclosed by the relied upon reference. In order to anticipate the claims, the reference(s) must teach or suggest each and every limitation of the claims.

Rejections under 35 U.S.C. §102(e)

The Office Action rejects claims 1, 2, 6, 10, 13, 17, 24 – 29, and 36 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,442,603 granted to Borella. Applicants respectfully traverse all of these rejections.

PATENT

It is immediately seen that the Office Action does not even argue that Borella discloses a security barrier. As stated above, the Office Action relies on disclosure of HTTP in Borella and nothing more. Borella discloses processing an HTTP request for electronic content, such as a hypertext mark-up language (HTML) table (col. 12, lines 25 – 50). Borella does not disclose or suggest validating the request and transmitting the validated request across a security barrier. **Borella discloses determining whether network latency exceeds a pre-determined latency value and splitting an HTML table accordingly (col. 12, lines 43 – 51).** The Office Action attempts to improperly fracture Applicants' claim and reject the claim piecemeal. However, even with the piecemeal approach the Office Action does not indicate any section of Borella that discloses transmitting validated request messages (or corresponding response messages) across a security barrier.

The Office Action relies on disclosure of Borella's second network device receiving an HTTP request. However, Borella's second network device receives an HTTP request and then the second network device determines network latency and splits the table accordingly, as already explained. **There is not even a suggestion that the HTTP request is transmitted across a security barrier after being received.** Furthermore, even if it is presumed, as done in the Office Action, that the split HTML tables are the response message, Borella also fails to disclose transmitting the split HTML tables across a security barrier. Although the Office Action rejects independent claim 22 under 35 U.S.C. §103(a), the Office Action relies on Borella for reasons discounted above. Borella does not disclose or suggest the following:

Claim 1:

validating a request message...
transmitting the validated request message across the security
barrier;
validating a response message...and
transmitting the validated response message across the security
barrier.

Claim 17:

...the first intermediary validating the formatted access request...
and

PATENT

forwarding the validated access request across the security barrier.

Claim 22:

...the intermediary validating the formatted response... and forwarding the validated response across the security barrier.

Claim 24:

...the data broker validates a request message...and forwards only validated request messages across the security barrier.

Claim 27:

means for validating the request message...and forwarding only validated request messages across the security barrier.

With regard to dependent claims 10 and 25, Borella does not disclose a first secure data broker, as already explained, and consequently does not disclose or suggest a second secure data broker. With the fallacious and presumptive characterizations of the Office Action, presumably the Office Action characterizes the second network device as a secure data broker. The remaining first network device must either be a second secure data broker or the security barrier, but cannot be both. It can immediately be appreciated that Borella fails to disclose or teach the limitations of claims 10 and 25. The lack of disclosure or suggestion is emphasized when referring to the section relied upon by the Office Action to support rejection of claim 25. The relied upon section merely recites possible devices for the first and second network devices, and nothing more (col. 10, lines 31 – 41).

Borella does not disclose or suggest any of Applicants' claims. For at least the reasons given above, Applicants respectfully submits that Applicants' independent claims 1, 17, 22, 24, and 27 are allowable over the art of record. The claims 2 – 16, 18 – 21, 23, 25 – 26, 28 – 29, and 36 – 41 depend on corresponding ones of the above allowable independent claims and are allowable at least for the reasons given above.

PATENT

Rejections under 35 U.S.C. §103(a)

The Office Action rejects claims 15 and 16 under 35 U.S.C. §103(a) as being unpatentable over Borella in view of U.S. Patent No. 5,602,918 granted to Chen et al. The Office Action rejects claim 3 under 35 U.S.C. §103(a) as being unpatentable over Borella in view of "Applied Cryptography" by Bruce Schneier. The Office Action rejects claims 4, 5, 7 – 9, 14, 18 – 23, 37, and 39 – 41 under 35 U.S.C. §103(a) as being unpatentable over Borella in view of U.S. Patent No. 5,870,549 granted to Bobo II. The Office Action rejects claims 11 and 12 under 35 U.S.C. §103(a) as being unpatentable over Borella in view of U.S. Patent No. 5,905,856 granted to Ottensooser. The Office Action rejects claims 30 – 33 and 35 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent 5,710,889 granted to Clark, et al. in view of Chen. The Office Action rejects claim 34 under 35 U.S.C. §103(a) as being unpatentable over Clark in view of Chen, and further in view of Bobo II. Applicants respectfully traverse all of these rejections.

Claim 11

As with numerous of the rejections, the Office Action rejects claim 11 without any support or basis. Claim 11 includes the following "if the request message is not successfully parsed, forwarding a response message without transmission of the request message across the security barrier," which is not disclosed or suggested by Borella. The section of Borella relied upon by the Office Action simply recites a list of communication protocols.

Claims 17, 22, 20

As discussed above, Borella does not disclose or teach forwarding validated messages across a security barrier. The Office Action combines Borella with Bobo II, stating that Bobo II provides disclosure of formatting messages. Even if Bobo II discloses formatting as recited in claims 17 and 22, which it does not, the Office Action never indicates or argues that any art of record discloses or suggests "predefining a request message specification corresponding to a structure response language" as recited in claim 17 and similarly in claims 20 and 22 for a response message.

PATENT

Claim 30

The Office Action continues to reject claim 30 with the same rejections as in the previous two Office Actions. Applicants maintain the argument of the previous responses. Applicants also point out additional failures of Clark and Chen as prior art. Claim 30 recites "data broker code and parser code...on a first network server separated from an information resource by a security barrier." The Office Action asserts that Clark discloses the first network server with the code and that Chen discloses the security barrier. Again, the Office Action provides no guidance as to how Clark and Chen are interpreted as disclosing claim 30 beyond citations and quoting Applicants' claim language. An attempt to apply claim 30 to Clark quickly fails. If the Global Interface Device (GID) is the first network server with the code, then the repository cannot be the information resource, because Clark's GID includes the repository and is not separate. In addition, Clark does not disclose or suggest any broker code in the GID. Furthermore, Chen's firewall cannot be inserted into the GID. It cannot be reasonably argued that claim 30 is obvious in view of the combination of Clark and Chen.

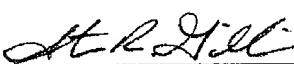
Neither Borella, Bobo II, Ottensooser, Schneier, Clark nor Chen, standing alone or in combination, does not disclose or suggest any of Applicants' claims. For at least the reasons given above, Applicants respectfully submits that Applicants' claims 3 – 5, 7 – 9, 11, 12, 14 – 23, 30 – 35, and 37 are allowable over the art of record.

Conclusion

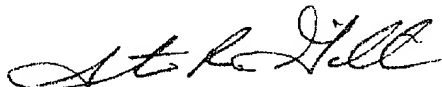
Independent claims 1, 17, 22, 24 and 27 and 30, together with claims dependent therefrom, are all allowable over Borella, and the other art of record. Applicants respectfully requests that the present rejections be immediately withdrawn and that all claims be indicated as allowable. Given the substantial unsupported presumptions and mischaracterizations by the Office, and the Office's failure to indicate support for numerous rejections, it is simply impractical to challenge each mischaracterization. Accordingly, Applicants do not acquiesce in the Office's characterization of the relied upon references. Instead, Applicants point to the defects and mischaracterizations made in support of the Office's §102 and §103 rejections as suggestive of a general lack of correspondence between asserted and actual disclosure and failure to reject the claims in a manner that allows Applicants to completely respond.

PATENT

In summary, claims 1 – 41 are in the case. All claims are believed to be allowable over the art of record, and a Notice of Allowance to that effect is respectfully solicited. Nonetheless, if any issues remain that could be more efficiently handled by telephone, the Examiner is requested to call the undersigned at the number listed below.

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 Steven R. Gilliam	<u>Aug-30-2004</u> Date

Respectfully submitted,



Steven R. Gilliam, Reg. No. 51,734
Attorney for Applicants(s)
(512) 338-6320
(512) 338-6301 (fax)

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